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Attorneys for Defendant  
WALLACE JENSEN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RICHARD PEREZ JR., individually and as  
co-successor-in-interest to Decedent  
RICHARD PEREZ III; and JULIE PEREZ,  
individually and as co-successor-in-interest  
to Decedent RICHARD PEREZ III,

Plaintiffs,

vs.

WALLACE JENSEN, individually and in  
his official capacity as Police Officer for  
the City of Richmond; and DOES 1-25,

Defendant.

Case No. C15-00256 WHA

**STIPULATION AND [PROPOSED]  
ORDER TO DISMISS ENTIRE ACTION,  
WITH PREJUDICE PER FRCP 41(A)(2)**

The parties, by and through their respective attorneys of record, hereby stipulate and jointly request an Order from the Court to a dismissal of this entire action, with prejudice, in light of settlement of this action.

WHEREAS, Plaintiffs hereby agree to voluntarily dismiss, with prejudice, all of their claims for damages against Defendant, as alleged in Plaintiffs' Complaint filed in this matter. This dismissal would be a dismissal for the entire action, with prejudice.

WHEREAS, each party agrees to bear its own fees and costs as to this dismissal.

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STIPULATION AND ORDER TO DISMISS ENTIRE  
ACTION, WITH PREJUDICE C15-00256 WHA

The parties attest that concurrence in the filing of these documents has been obtained from each of the other Signatories, which shall serve in lieu of their signatures on the document.

SO STIPULATED.

Dated: February 18, 2016

Law Offices of John L. Burris

By: /s/ Lacy, DeWitt

John L. Burris / DeWitt Lacy

Attorneys for Plaintiffs

RICHARD PEREZ, JR. and JULIE PEREZ

Dated: February 18, 2016

MCNAMARA, NEY, BEATTY, SLATTERY,  
BORGES & AMBACHER LLP

By: /s/ Blechman, Noah

James V. Fitzgerald, III

Noah G. Blechman

Attorneys for Defendant

WALLACE JENSEN

**ORDER**

**PURSUANT TO STIPULATION AND REQUEST, IT IS ORDERED AS FOLLOWS:**

The Court hereby dismisses this entire action against Defendant, as to all claims, with prejudice. Each party bears its own fees and costs as to this dismissal.

IT IS SO ORDERED

Dated: February 22, 2016

By: 

Hon. William H. Alsup  
U.S. District Court Judge